
**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re BP p.l.c. Securities Litigation

No. 4:10-MD-02185

Honorable Keith P. Ellison

JURY TRIAL DEMANDED

ORAL ARGUMENT REQUESTED

DECLARATION OF THOMAS W. TAYLOR

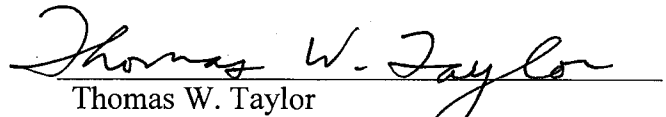
Pursuant to 28 U.S.C. § 1746, I, THOMAS W. TAYLOR, declare as follows:

1. I am over twenty-one years of age and I am fully competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I am an attorney in the law firm of Andrews Kurth LLP. My office is located at 600 Travis, Suite 4200, Houston, Texas 77002.
3. I am a member in good standing of the Bar of the State of Texas.
4. I am one of the attorneys for the defendants named in the New York and Ohio Plaintiffs' Second Consolidated Amended Class Action Complaint ("SAC") (Docs. 339 (sealed), 346) in the above-captioned matter. I submit this declaration to provide the Court with materials cited in Defendant's Reply in Support of Their Motion to Dismiss in part the Second Consolidated Amended Complaint, which is being filed on June 8, 2012.¹

¹ Exhibits DD and FF contain confidential information and are filed under seal pursuant to the January 19, 2011 Order Protecting Confidentiality (Doc. 94).

5. Attached hereto as Exhibit CC is a true and correct copy of excerpts from the Deposition of John Mogford held on June 28 and 29, 2011. The material excerpted from the June 28, 2011, transcript includes the cover, pages 165-68 and 375 of the 375-page document. The material excerpted from the June 29, 2011, transcript includes the cover, pages 472-75 and 642 of the 642-page document.
6. Attached hereto as Exhibit DD is a true and correct copy of excerpts from the Orange Book for the Fourth Quarter of 2009, dated January 27, 2010. The excerpted material includes the cover, pages G1, E1, E17 and a page bearing production number BP-HZN-CEC083204 of the 137-page document. These pages provide a more complete set of excerpts than was included with Exhibit E to the Declaration of Georgia L. Lucier (Docs. 356 (sealed), 357) filed May 2, 2012, which inadvertently omitted page G1.
7. Attached hereto as Exhibit EE is a true and correct copy of the Brief of 16 Public Pension Funds as *Amicus Curiae* in Support of Petitioner, dated March 1, 2011, submitted in *Erica P. John Fund, Inc. v. Halliburton Co.*, 131 S. Ct. 2179 (2011).
8. Attached hereto as Exhibit FF is a true and correct copy of excerpts from a Pre-Read for a meeting of the BP Group Operations Risk Committee ("GORC") dated July 31, 2009. The excerpted material is from pages bearing production numbers BP-HZN-CEC083062 and BP-HZN-CEC083102-03 of the 62-page document.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in cursive script, reading "Thomas W. Taylor", is written over a horizontal line.

Thomas W. Taylor
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Executed on this 8th day of June, 2012